

**ORANSKY, SCARAGGI & BORG, P.C.**

Michael T. Scaraggi, Esq., (9463)  
175 Fairfield Avenue, Suite 1A  
West Caldwell, New Jersey 07006  
[973] 364-1200  
*Attorneys for Plaintiff(s)*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

OPERATIVE PLASTERERS AND )  
CEMENT MASONS LOCAL NO. 29 )  
ANNUITY FUND, WELFARE FUND, )  
APPRENTICE TRAINING FUND and )  
MARC GALLO, Trustee )

*Plaintiffs,*

v.

INDUSTRIAL CONSTRUCTION OF )  
NEW JERSEY, INC. )

*Defendant.*

Civil Action No.: 2:20-cv-10278-JMV-JAD

**NOTICE OF MOTION**

TO: Michelle Frisina, President  
Industrial Construction of NJ, Inc.  
833 Ewing Ave.  
Lyndhurst, NJ 07071

William Goldberg, Esq.  
45 Essex Street, Third Floor  
Hackensack, NJ 07601

***PLEASE TAKE NOTICE*** that on Monday, July 17 at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiffs shall move before the U.S. District Court for the District of New Jersey before the Honorable John M. Vazquez, U.S.D.C., for the following relief:

*For an Order entering Judgment by Default in favor of Plaintiffs and against Defendant in the amount of \$96,037.38.*

*In support of this Motion, Plaintiffs will rely upon the attached Affidavit of Michael T. Scaraggi, Esq., and Plaintiffs waive oral argument.*

ORANSKY, SCARAGGI & BORG, P.C.  
*Attorneys for Plaintiffs*

By:   
Michael T. Scaraggi (9463)

*Dated: June 20, 2023*